273040

[redacted]

OK
J Jeff B
Franklin H-U

[redacted]

**TO:** Jeff Bauer

**COMPANY:** USEPA

**FAX NO.** [redacted]

**FROM:** [redacted]

**FAX NO.** [redacted]

**TELEPHONE:** [redacted]

**DATE:** February 10, 2004

**MESSAGE: re: P04-139, 141, 144**

In response to our telephone conversation, by copy of this fax, [redacted] is requesting an extension of the review periods for the above-referenced PMNs to March 5, 2004.

Any questions/comments please call [redacted]. Thank you very much for your assistance. I look forward to speaking to you again soon.

[redacted]

PAGES (Including Cover Sheet: 1

[redacted]

[redacted]

[redacted]

[redacted]

**TO:** Jeff Bauer

**COMPANY:** USEPA

**FAX NO.** 202-564-9490

**FROM:** [redacted]

**FAX NO.** [redacted]

**TELEPHONE:** [redacted]

**DATE:** February 10, 2004

**MESSAGE: re: P04- 141**

In response to our telephone conversation, enclosed please find amended pages 8, 9,and 10 for the above-referenced PMN. This amendment accurately reflects the measures to be used to control the release of the material to the environment.

Any questions/comments please cal[redacted] Thank you very much for your assistance. I look forward to speaking to you again soon

[redacted]

PAGES (Including Cover Sheet: 4

[redacted]

# Part II– HUMAN EXPOSURE AND ENVIRONMENTAL RELEASE

## Section A – INDUSTRIAL SITES CONTROLLED BY THE SUBMITTER

Mark (X) the "Confidential" box next to any item you claim as confidential

Complete section A for each type of manufacture, processing, or use operation involving the new chemical substance at industrial sites you control. Importers do not have to complete this section for operations outside the U.S.; however, you may still have reporting requirements if there are further industrial processing or use operations after import. You must describe these operations. See instructions manual

| 1. Operation description<br>a. Identity – Enter the identity of the site at which the operation will occur. | Confi-dential |
|---|---|
| [redacted] | X |
| If the same operation will occur at more than one site, enter the number of sites. Identify the additional sites on a continuation sheet, and if any of the sites have significantly different production rates or operations, include all the information requested in this section for those sites as attachments. → | |
| ☐ Mark (X) this box if you attach a continuation sheet. | |
| b. Type – Mark (X) [redacted] Manufacturing [redacted] Processing [redacted] Use | X |
| c. Amount and Duration -- Complete 1 or 2 as appropriate | |
| 1. Batch — Maximum kg/batch (100% new chemical substance) [redacted] / Hours/batch / Batches/year | X |
| 2. Continuous — Maximum kg/day (100% new chemical substance) / Hours/day / Days/year | |
| d. Process description ☐ Mark (X) to indicate your willingness to have your process description binding. | X |

(1) Diagram the major unit operation steps and chemical conversions. Include interim storage and transport containers (specify- e.g. 5 gallon pails, 55 gallon drum, rail car, tank truck, etc.).

(2) Provide the identity , the approximate weight (by kg/day or kg/batch on a 100% new chemical substance basis), and entry point of all starting materials and feedstocks (including reactants, solvents, catalysts, etc.), and of all products, recycle streams, and wastes. Include cleaning chemicals (note frequency if not used daily or per batch.).

(3) Identify by number the points of release, including small or intermittent releases, to the environment of the new chemical substance.

[redacted]

☐ Mark (X) this box if you attach a continuation sheet

## Part II– HUMAN EXPOSURE AND ENVIRONMENTAL RELEASE – Continued

### Section A – INDUSTRIAL SITES CONTROLLED BY THE SUBMITTER – Continued

2. **Occupational Exposure** – You must make separate confidentiality claims for the description of worker activity, physical form of the new chemical substance, number of works exposed, and duration of activity. Mark (X) the "Confidential" box next to any item you claim as confidential.
   (1) – Describe the activities (i.e. bag dumping, tote filling, unloading drums, sampling, cleaning, etc.) in which workers may be exposed to the substance.
   (2) – Mark (X) this column if entry in column (1) is confidential business information (CBI).
   (3) – Describe any protective equipment and engineering controls used to protect workers.
   (4) and (6) – Indicate your willingness to have the information provided in column (3) or (5) binding.
   (5) – Indicate the physical form(s) of the new chemical substance (e.g., solid: crystal, granule, powder, or dust) and % new chemical substance (if part of a mixture) at the time of exposure.
   (7) – Mark (X) this column if entry in column (5) is confidential business information (CBI).
   (8) – Estimate the maximum number of workers involved in each activity for all sites combined.
   (9) – Mark (X) this column if entry in column (8) is confidential business information (CBI).
   (10) and (11) – Estimate the maximum duration of the activity for any worker in hours per day and days per year.
   (12) – Mark (X) this column if entries in columns (10) and (11) are confidential business information (CBI).

**P04-141 AMENDED**

| Worker activity (i.e., bag dumping, filling drums) (1) | CBI (2) | Protective Equipment/ Engineering Controls (3) | Binding Option Mark (x) (4) | Physical forms (s) and % new substance (5) | Binding Option Mark (x) (6) | CBI (7) | # of Workers Exposed (8) | CBI (9) | Maximum Hrs/day (10) | Duration Days/yr (11) | CBI (12) |
|---|---|---|---|---|---|---|---|---|---|---|---|
| [redacted] | | | | | | | | | | | |
| [redacted] | | | | | | | | | | | |
| [redacted] | | | | | | | | | | | |
| | | | | | | | | | | | |

☐ Mark (X) this box if you attach a continuation sheet.

3. **Environmental Release and Disposal** – You must make separate confidentiality claims for the release number and the amount of the new chemical substance released and other release and disposal information. Mark (X) the "Confidential" box next to each item you claim as confidential.
   (1) – Enter the number of each release point identified in the process description, part II, section A, subsection 1d(3).
   (2) – Estimate the amount of the new substance released (a) directly to the environment or (b) into control technology (in kg/day or kg/batch).
   (3) – Mark (X) this column if entries in columns (1) and (2) are confidential business information (CBI).
   (4) – Identify the media (stack air, fugitive air (optional-see Instruction Manual), surface water, on-site or off-site land or incineration, POTW, or other (specify)) to which the new substance will be released from that release point.
   (5) – a. Describe control technology, if any, and control efficiency that will be used to limit the release of the new substance to the environment. For releases disposed of on land, characterize the disposal method and state whether it is approved for disposal of RCRA hazardous waste. On a continuation sheet, for each site describe any additional disposal methods that will be used and whether the waste is subject to secondary or tertiary on-site treatment. b. Estimate the amount released to the environment after control technology (in kg/day).
   (6) – Mark (X) this column if entries in columns (4) and (5) are confidential business information (CBI).
   (7) – Identify the destination(s) of releases to water. Please supply NPDES (National Pollutant Discharge Elimination System) numbers for direct discharges or NPDES numbers of the POTW (Publicly Owned Treatment Works). Mark (X) if the POTW name or NPDES # is confidential business information (CBI).

| Release Number (1) | Amount of new substance released (2a) | (2b) | CBI (3) | Media of release e.g. stack air (4) | Control technology and efficiency (you may wish to optionally attach efficiency data) (5a) | Binding Mark (X) | (5b) | CBI (6) |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | X |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

| (7) Mark (X) the destination (s) of releases to water | POTW provide name(s) below: | CBI | ☐ Navigable waterway | ☐ Other – Specify | provide NPDES # | CBI |
|---|---|---|---|---|---|---|
| | | | | | | |

☐ Mark (X) this box if you attach a continuation sheet.

# Part II– HUMAN EXPOSURE AND ENVIRONMENTAL RELEASE – Continued

## Section B – INDUSTRIAL SITES CONTROLLED BY OTHERS

Complete section B for typical processing or use operations involving the new chemical substance at sites you do not control. Importers do not have to complete this section for operations outside the U.S.; however, you must report any processing or use activities after import. See the Instructions Manual. *Complete a separate section B for each type of processing, or use operation involving the new chemical substance.* If the same operation is performed at more than one site describe the typical operation common to these sites. Identify additional sites on a continuation sheet.

1. **Operation Description** – To claim information in this section as confidential, circle or bracket the specific information that you claim as confidential. (1) – Diagram the major unit operation steps and chemical conversions, including interim storage and transport containers (specify - e.g. 5 gallon pails, 55 gallon drums, rail cars, tank trucks, etc). On the diagram, identify by letter and briefly describe each worker activity. (2) – Provide the identity, the approximate weight (by kg/day or kg/batch, on an 100% new chemical substance basis), and entry point of all feedstocks (including reactants, solvents and catalysts, etc) and all products, recycle streams, and wastes. Include cleaning chemicals (note frequency if not used daily or per batch). (3) – Identify by number the points of release, including small or intermittent releases, to the environment of the new chemical substance. (4) Please enter the # of sites (remember to identify the locations of these sites on a continuation sheet):

[redacted]

2. **Worker Exposure/Environmental Release**
   (1) – From the diagram above, provide the letter for each worker activity. Complete 2-8 for each worker activity described.
   (2) – Estimate the number of workers exposed for all sites combined.
   (4) – Estimate the typical duration of exposure per worker in (a) hours per day and (b) days per year.
   (6) – Describe physical form of exposure and % new chemical substance (if in mixture), and any protective equipment and engineering controls, if any, used to protect workers.
   (7) – Estimate the percent of the new substance as formulated when packaged or used as a final product.
   (9) – From the process diagram above, enter the number of each release point. Complete 9-13 for each release point identified.
   (10) – Estimate the amount of the new substance released (a) directly to the environment or (b) into control technology to the environment (in kg/day or kg/batch).
   (12) – Describe media of release i.e. stack air, fugitive air (optional-see Instructions Manual), surface water, on-site or off-site land or incineration, POTW, or other (specify) and control technology, if any, that will be used to limit the release of the new substance to the environment.
   (14) – Identify byproducts which may result from the operation.
   (3), (5), (8), (11), (13) and (15) – Mark (X) this column if any of the proceeding entries are confidential business information (CBI).

| Letter of Activity (1) | # of Workers Exposed (2) | CBI (3) | Duration of Exposure (4a) | Duration of Exposure (4b) | CBI (5) | Protective Equip. / Engineering Controls/ Physical Form and % new substance (6) | % in Formulation (7) | CBI (8) | Release Number (9) | Amount of New Substance Released (10a) | Amount of New Substance Released (10b) | CBI (11) | Media of Release & Control Technology (12) | CBI (13) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |

(14) – Byproducts: (15)

☐ Mark (X) this box if you attach a continuation sheet.